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Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Brandon Kotaniemi, individually and as special
co-administrator of the Estate of Marsha
Kotaniemi; Steven Kotaniemi, individually and
as special co-administrator of the Estate of
Marsha Kotaniemi,

,

Plaintiffs,

v.

Brian C. Ward, MD, an individual in his
official capacity; Stephanie Martinez, MD,
an individual in her official capacity; Emily
Tibbits, MD, an individual; Lisa Angotti,
MD an individual; State of Nevada ex rel
The Board of Regents of the Nevada System
of Higher Education ex rel the University of
Nevada, Las Vegas, a political subdivision;
DOE INDIVIDUALS I-X, inclusive; and
ROE CORPORATIONS I-X, inclusive,

Defendants.

Case No. 2:25-cv-00540-APG-MDC

**Stipulation and Order for Extension of
Time to Respond to Complaint**

(THIRD REQUEST)

Plaintiffs Brandon Kotaniemi and Steven Kotaniemi, through counsel and the
United States of America, on behalf of federal defendants, Emily Tibbits, MD and Lisa

1 Angotti, MD (“United States” and/or “Federal Defendants”), hereby stipulate and agree as
2 follows:

3 1. Plaintiffs filed their complaint in the Eighth Judicial District Court Clark
4 County, Nevada on February 4, 2025.

5 2. Federal Defendants, United States, removed this case to the United States
6 District Court, District of Nevada on March 24, 2025.

7 3. Plaintiffs and the United States entered into a stipulation granted by this
8 Court extending the time for Federal Defendants to respond to the complaint through April
9 16, 2025 (ECF No. 9).

10 4. Plaintiff and the United States entered into a subsequent stipulation granted
11 by this Court extending the time for Federal Defendants to respond to the complaint
12 through April 29, 2025 (ECF No. 13).

13 5. Plaintiff and the United States now stipulate and agree to extend the time for
14 Federal Defendants to respond to the complaint through May 13, 2025.

15 6. The extension of time is necessary for the United States’ counsel to discuss
16 the procedural posture of the case with opposing counsel to formulate its response, and due
17 to conflicting deadlines, the parties have been unable to coordinate the discussion until
18 May 1, 2025.

19 Therefore, the parties request that the Court extend the deadline for the United
20 States to respond to Plaintiffs’ complaint through May 13, 2025.

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1 This stipulated request is filed in good faith and not for the purpose of undue delay.

2 Respectfully submitted this 29th day of April 2025.

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4 SIGAL CHATTAH
United States Attorney

5 THE POWELL LAW FIRM

6 /s/ Tom W. Stewart
7 TOM W. STEWART
8 8918 Spanish Ridge Avenue, Suite 100
Las Vegas, Nevada 89148

9 *Attorney for Plaintiffs*

/s/ Karissa D. Neff
KARISSA D. NEFF
Assistant United States Attorney
Attorneys for Federal Defendants

10 **IT IS SO ORDERED:**

11
12 **UNITED STATES MAGISTRATE JUDGE**

13 **DATED:** _____
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